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4 Dec 1998

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To: Distribution

Subj: MONTHLY PROGRESS REPORT FOR OCTOBER 1998, ENGINEERING FIELD  
ACTIVITY, WEST, NAVAL FACILITIES ENGINEERING COMMAND,  
HUNTERS POINT SHIPYARD, SAN FRANCISCO, CALIFORNIA

Encl: (1) October 1998 Monthly Progress Report (MPR)

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## **MONTHLY PROGRESS REPORT**

**OCTOBER 1998**

### **NAVAL FACILITIES ENGINEERING COMMAND**

#### **HUNTERS POINT SHIPYARD**

##### **1. PROGRESS DURING THE REPORT PERIOD**

The Hunters Point Shipyard (HPS) activities described below were completed during the current report period. Those activities described as complete in the previous monthly progress report have been omitted for brevity.

##### **Field Work**

**PARCEL B:** Additional field work which remains from the initial data gap field effort consists of (1) the collection of a groundwater sample from the monitoring well in Installation Restoration Site (IR)-10 which had encountered volatile organic compounds (VOCs) in the remedial investigation, (2) an additional phase of the infiltration study, and (3) additional sampling on the off-site property adjacent to IR- 07 and 18 to determine the extent of contamination and possible migration. As was discussed in the September Monthly Progress Report part of the ongoing work under the data gap field effort consists of the two new groundwater monitoring wells in the B-aquifer. These two wells which had been sampled in July were sampled a second time on October 30, 1998.

The sample to be collected from IR-10 is still awaiting collection as discussed in previous monthly progress reports. As soon as the soil that is obstructing access to the monitoring well is moved from Building 123, the sample will be collected. The scheduled removal of this soil that remains from the IR-6 removal action is in November. A revised approach for the infiltration study which reflects comments received from the regulatory agencies with additional proposed sampling will be submitted to the BRAC Closure Team (BCT) in November, with fieldwork to be conducted later in the field season. The off-site work adjacent to IR-7 and IR-18 which is part of the data gaps work will be combined with the remedial action monitoring plan well installation which is planned for December 1998. This should solve the access issues for these sites which were discussed in last month's progress report.

**BASEWIDE:** Routine waste management tasks were performed during October, primarily consisting of inspecting tank and bin locations and the decontamination pad.

##### **Remedial Investigation (RI) Documents**

**PARCEL E:** The draft final Parcel E Validation Study Work Plan and Field Sampling Plan was submitted on October 14, 1998 with comments due on November 16, 1998. The draft Parcel E Validation Study Quality Assurance Project Plan Addendum was submitted to the agencies for review on October 26, 1998 with comments due on November 25, 1998. As was noted in previous progress reports, the results of the validation study will be incorporated in the draft final Parcel E Feasibility Study.

The response to comments on the draft final Parcel E RI was submitted on October 7, 1998. The response to comments included an analysis of the impacts to the proposed remediation due to the use of

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1998 U.S. EPA preliminary remediation goals (PRGs) versus the 1996 PRGs and a response to the California Department of Health Services' comments on the radiation investigation. The Parcel E RI will be considered complete once the results of the validation study have been published. The Parcel E RI is the last RI scheduled for HPS.

### **Feasibility Study (FS) Reports**

**PARCEL C:** The draft final Parcel C FS was submitted on July 15, 1998. A meeting was held on October 6, 1998 between the Navy and the regulatory agencies to discuss the issues raised in the comments. Some of the issues discussed in the meeting such as; the level and depth of cleanup; classification of groundwater as a drinking water source; and the impact of the hydrogeologic interconnections between the A and B aquifers which are also being discussed in regards to the Parcel D Record of Decision (ROD) would impact the schedule for the submittal of the draft final Parcel C FS. Based on the interrelated aspects of the issues, the Navy proposed to submit a revised schedule for the FS following the resolution of the issues being discussed in the Parcel D ROD.

**PARCEL E:** The submittal date for the draft final Parcel E FS is April 19, 1999. To be included as an appendix in the FS is the evaluation of the feasibility of wetlands creation in Parcel E which is scheduled to be submitted on November 3, 1998. On October 30, 1998 a draft Parcel E Data Gaps Work Plan and Sampling Analysis Plan was submitted for review to the regulatory agencies with comments due on December 16, 1998. The Navy hopes to implement the plan and report the results in the draft final Parcel E FS.

**PARCEL F:** The draft Parcel F FS was submitted on April 3, 1998. As was stated in the last monthly progress report, the period of review for this document was extended until June 18, 1998 at the request of the regulatory agencies. The original schedule for the submittal of the draft final was August 3, 1998; however, due to the extended review period, along with concerns regarding issues related to the interconnection of the remedial alternatives under consideration for the Parcel E FS that date has been delayed and will need to be revised.

**MULTI-PARCEL:** A technical memorandum by the Navy evaluating the integration of the remedial alternatives in Parcel E and F was submitted to the regulatory agencies on September 30, 1998 and a meeting was held on October 20, 1998 to discuss the issues raised. Following evaluation of the issues raised at that meeting and comments from the regulatory agencies, the schedule for the submittal of the draft final Parcel F FS will be revised.

### **Proposed Plan (PP)**

Submission dates for the draft PPs are currently September 18, 1998 for Parcel C and October 2, 1998 for Parcel F. These dates will have to be revised due to various issues raised in the FS documents, which need to be addressed. The submission date for the Parcel E Draft PP is July 5, 1999.

### **Record of Decision (ROD)**

The revised schedule for the Parcel D ROD continues to be discussed at the BCT/Remedial Project Managers (RPM) meetings. In previous meetings several issues were discussed that still need resolution. Since there are still outstanding issues for the Parcel D ROD that will require additional time to resolve the Navy is still evaluating the date for the submittal of the draft Final Parcel D ROD. The revised schedule and issues were discussed most recently at the BCT/RPM meeting which was held on October

20, 1998. It was agreed that the Navy would prepare a technical memorandum evaluating the EPA and State criteria for classification of drinking water, and to evaluate the issues in regards to the possible interconnection of the A and B aquifers in portions of Parcel D, and also the possible need for protection of groundwater quality in the B aquifer in those areas. In an e-mail received on October 13, 1998 from the EPA to the Navy, additional information was requested concerning costs and cleanup approaches. The data package is scheduled for submittal on November 9, 1998 with a meeting to discuss the issues on November 16, 1998.

### **Remedial Design Documents**

**PARCEL B:** The Remedial Design (RD) and remedial action documents have overlapping submittal and review cycles due to the accelerated schedule for the cleanup.

A portion of the RD documents which addresses the confirmation sampling, the Remedial Action (RA) Confirmation Sampling and Analysis Plan, has raised issues which have been discussed by the BCT. As was discussed in previous monthly progress reports, several meetings were held to discuss issues regarding the sampling approach and issues regarding the quality assurance project plan. As a result of additional discussions in July and August, a revised approach and responses to the written comments were submitted on September 4, 1998. Documents to be included in future submittals will consist of revisions to the Remedial Action Monitoring Plan, revised RD drawings and technical specifications and a revised approach to the infiltration study for the storm drains in Parcel B. The submittal of these documents would complete the work on the remedial design documents for Parcel B.

The draft final Parcel B RA documents were submitted on June 25, 1998. EPA expedited their review of the submitted documents and agreed on June 30, 1998 that they could support the beginning of the fieldwork in July. The written responses to the agencies' comments were submitted in August, which completes the RA documents for Parcel B. To document changes that have occurred in the RA, documents reflecting additional work such as areas of petroleum cleanup and revised drawings and text will be provided to the regulatory agencies in November. At that time only the addenda for fuel line removal and storm drain work will remain to be submitted for review which is estimated to occur in November or December of 1998.

**PARCEL D:** Preparation of the Parcel D preliminary RD documents continues.

### **Remedial Action Implementation**

The remedial action in Parcel B began on July 14, 1998 with excavation commencing in IR-7, IR-18 and IR-60. Excavations were started in various "de minimus areas" (small isolated areas of contamination) and in the larger remedial action areas. By the end of September, 26 de minimus areas and remedial action areas had been excavated to the boundaries proposed in the remedial design. Of these original 26 areas, excavation has begun for the 18 that required over-excavation to "chase" the contamination encountered. Approximately 62,400 tons of excavated soil has been trucked off or transported by railcar and disposed of off site at either a Class I or a Class II facility. The screening samples were evaluated to see which of these excavations were considered clean and ready for confirmation sampling. If they are not ready for confirmation sampling, then additional excavation will be necessary to remove remaining contamination. Additionally, approximately 5,200 tons of soil characterized as California Hazardous Waste has been transported by rail for disposal out of state.

## **Removal Actions**

See Section 6, Deliverables Status, for a description of the current status for the Removal Actions and a document deliverable update.

## **2. MEETINGS AND REPORTS SUBMITTED**

### **Meetings in October 1998**

Several meetings and a field trip in addition to the usual BCT/RPM meeting were held during this period. A field trip was made on October 5, 1998 to the remedial action areas in Parcel B and adjacent portions of HPS where serpentinite bedrock is exposed, to help in the current evaluation of naturally occurring nickel in the soil and bedrock. A meeting was held between the Navy and regulatory agencies on October 6, 1998 to discuss the Parcel C FS response to comments with another meeting on that same day to discuss the use of institutional controls in the Parcel B transfer. The monthly BCT/RPM meeting to discuss the status of the cleanup at HPS was held on October 13, 1998. Additional meetings were held between the Navy and regulatory agencies to discuss the technical memorandum evaluating the integration of the E and F remedial alternatives and to discuss the major issues to be resolved for the Parcel F FS on October 20, 1998. Finally a conference call was held on October 22, 1998 between the Navy and the regulatory agencies to discuss the cleanup levels for polynuclear aromatic hydrocarbons (PAHs) being used in the Parcel B cleanup.

The Restoration Advisory Board (RAB) meeting was held on October 28, 1998. This RAB meeting consisted of a brief update on the remedial action in Parcel B at HPS and additional discussion regarding the contracting approach for local employment opportunities used by the Remedial Action Contractor (RAC) in the Parcel B remedial action.

### **Documents Submitted in October 1998**

The documents submitted by the Navy during the report period were as follows:

- Draft Final Parcel E Validation Study Work Plan and Field Analysis Sampling Plan
- Draft Parcel E Validation Study Quality Assurance Project Plan Addendum
- Draft Parcel E Data Gaps and Sampling Analysis Work Plan
- Response to Agency Comments on the Draft Final Parcel E RI
- Technical Memorandum of the Calculation of Background Nickel Levels
- Addendum No. 1 to Final Finding of Suitability to Lease Helicopter Landing Pad

## **3. PROBLEMS ENCOUNTERED AND RESOLUTIONS**

### **Target Cleanup Level for Nickel in the Parcel B Remedial Action**

As was discussed in the previous monthly progress report in the Parcel B remedial action levels of nickel have been encountered above the target cleanup level documented in the Parcel B ROD. It appears that the nickel encountered may be due to the occurrence of nickel-rich bedrock at the site rather than due to

contamination. To evaluate the possibility the Navy is investigating the nature of the nickel occurrence in conjunction with evaluating additional parameters that may be used as indicators. Several discussions have taken place between the Navy and DTSC (the agency on the BCT responsible for evaluating background level approaches) regarding the revised approach and a site visit was conducted on October 5, 1998. Subsequent to the site visit a technical memorandum was submitted to DTSC on October 22, 1998 with comments due on October 30, 1998. A conference call between the Navy and the EPA's toxicologist Dr. Stralka is scheduled for November 3, 1998 to further discuss the approach. Following the receipt of comments from DTSC the issues raised by both DTSC and EPA will be addressed in a revised technical memorandum and written responses to comments. Although the issue arose in the course of the Parcel B remedial action similar problems are expected to occur in the remedial actions in Parcels D, C and E.

#### **Petroleum-Only Sites at Hunters Point Shipyard (HPS)**

The Navy is continuing to reevaluate its approach on determining petroleum cleanup levels based on its meeting with the RWQCB on May 7, 1998. The revised approach will be based on evaluating the current geochemical conditions in the petroleum contaminant plumes and the resultant implications for remediation. The Navy will document the revised approach in the upcoming scope for the completion of the Parcel B CAP and preparation of the Parcel C, D and E CAPs. This approach will require additional sampling to be proposed in a work plan which will be submitted to the RWQCB in January 1999.

#### **Cleanup Scenario for Remedial Action at Parcel D**

The Navy has proposed a cleanup scenario at Parcel D in the Draft Parcel D ROD consisting of a cleanup to industrial use, with a goal of  $10^{-5}$  risk to industrial workers involving excavation to the groundwater table or to a maximum depth of 10 feet below ground surface to remove contaminants. The community and the regulatory agencies have expressed concern regarding the goal of a  $10^{-5}$  industrial risk and feel that a  $10^{-6}$  industrial risk is more appropriate. Previously, discussions have been held between the Navy and the BCT to discuss this issue. Many of the Draft Final Parcel D ROD issues that have been brought up in the comments from the BCT have been resolved. However, there are several significant issues that need resolution in addition to the issue concerning the level of cleanup. An e-mail was received by the Navy from the EPA requesting additional cost information to be included in a submittal on November 9, 1998 with a meeting to discuss the issues scheduled for November 16, 1998. The issues raised could have a significant impact on the cleanup in the other parcels with a proposed industrial reuse, Parcels C and E and delays in the resolution of the Parcel D may affect the schedules for those parcels.

#### **Wetlands Creation Evaluation at Parcels B and E**

In previous monthly progress reports, the issue of creation of wetlands by the City of San Francisco in Parcel B and E has been discussed. The process is complete for Parcel B. The Final Evaluation of the Potential for Wetland Creation at Parcel E, which completes the work in evaluating wetlands creation, will be issued November 3, 1998.

### **4. REPORTS AND ACTIVITIES FOR NOVEMBER 1998**

#### **Documents Scheduled for Submittal in November 1998**

The following documents are scheduled to be submitted in the next report period:

- Revised Response to Agency Comments on the Draft Parcel A FOST

- Final FOSL for Building 813 and Trailer Site
- Final FOSL for Building 915 and Building E
- Revised Parcel B Infiltration Study Proposal
- Revised Technical Memorandum on the Calculation of Background Nickel Levels
- Final Evaluation of the Potential for Wetlands Creation at Parcel
- Parcel B RA Workplan Revision 2
- Parcel B RA Sampling and Analysis Plan Revision 2
- Technical Memorandum on Analysis of A and B Aquifer Hydraulic Connections and Aquifer Classification Criteria for Parcel D
- Final Evaluation of the Potential for Wetlands Creation at Parcel E

#### **Activities for November 1998**

**Field Work:** Complete data gaps field work in Parcel B, continue the remedial action in Parcel B sub-area B-1, and begin excavation in sub-area B-2.

**Removal Actions:** Begin operation of the groundwater extraction system at IR-1/21 in Parcel E following approval of the discharge permit by the City of San Francisco.

**Meetings:** Prepare for a conference call to discuss the source of nickel in the bedrock for Parcel B on November 3, 1998. Prepare for the BCT/RPM meeting scheduled for November 10, 1998. Attend a meeting on November 16, 1998 to discuss the issues presented in the agencies' comments on the draft final Parcel D ROD. Prepare for the combined November/December RAB meeting to be held on December 2, 1998.

**Ongoing Work:** Continue work on various documents/studies/meetings.

#### **5. KEY PERSONNEL CHANGES**

DTSC's RPM for HPS is still to be determined. Until the replacement is designated, Mr. Chein Kao will act as the DTSC representative on the BCT.

#### **6. DELIVERABLES STATUS**

This listing consists of installation deliverables organized by parcel, multiparcel (or facility wide), or removal action, as applicable, and their status. Please note that as deliverables are completed, they are not included in subsequent progress reports.



### **Parcel A Reports**

**Final Parcel A Finding of Suitability to Transfer (FOST):** A resolution was reached involving the change of Parcel A boundaries to exclude Crisp Avenue and include Spear Street in Parcel A. The revised response to agency comments on the Parcel A draft FOST will be submitted in early November. The Navy will resurvey and revise the Parcel A boundary map and legal description. This will be included as an attachment in the draft Final FOST for Parcel A.

### **Parcel B Reports**

**Parcel B Remedial Design Package:** The draft final Revision 1 Remedial Design Documents were submitted on March 23, 1998. Additional minor modifications as requested by the agencies were submitted on April 10, 1998. The submittal date for the final version of this document will be determined following evaluation of agencies' comments received in May and issues discussed in several subsequent meetings. The submittal date has been revised to December.

**Parcel B Remedial Design Implementation Work Plan:** The draft final Remedial Action Documents (implementation work plan) were submitted on June 25, 1998 with a response to agency comments submitted in the first week of August. Additional minor corrections are expected to be submitted in November.

**Parcel B Infiltration Study:** The Parcel B infiltration study, which presents the result of the field investigation of the storm drain line that are below the groundwater table that intersect contaminant plumes, was submitted on April 24, 1998. Comments were received from DTSC on May 18, 1998 and were received from the EPA and RWQCB on June 1 and 2, 1998. Evaluation of those comments continues with the submittal of the draft final version now expected in mid-November to the BCT.

### **Parcel C Reports**

**Draft Final Parcel C FS Report:** The submittal date was July 15, 1998. Comments were received from the EPA, DTSC and RWQCB by the end of the review period on August 31, 1998. The Navy is expected to revise the schedule following resolution of the pertinent issues in the Parcel D ROD discussions.

### **Parcel D Reports**

**Draft Final Parcel D ROD:** To resolve various issues, the draft final Parcel D ROD was rescheduled by the BCT to August 21, 1998; however, due to outstanding issues the ROD will need to be revised based on ongoing discussions by the BCT. The Navy had proposed a submittal date of October 13, 1998 which has passed. A new date will need to be submitted in November based on current discussions of the still unresolved issues.

### **Parcel E Reports**

**Final Parcel E RI Report:** The Navy's responses to agency comments on the draft Final Parcel E RI report were submitted on October 7, 1998.

**Draft Parcel E Ecological Risk Assessment Model Validation Study Work Plan:** Submittal of the draft Final Work Plan was submitted on October 14, 1998. The draft Quality Assurance Project Plan Addendum was submitted on October 26, 1998.

**Draft Parcel E FS Report:** The draft Parcel E FS report was submitted on January 15, 1998. The submittal date for the draft final Parcel E FS is April 19, 1999.

#### Parcel F Reports

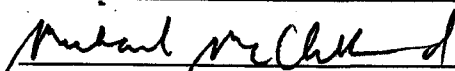
**Draft Parcel F FS Report:** The draft Parcel F FS report was submitted on April 3, 1998. Following a meeting held on October 20, 1998 discussing the technical memorandum which evaluated the integration of the Parcel E and F remedial alternatives and their impact the Navy is awaiting input from the BCT on which approach is considered best. The schedule for the draft final Parcel F FS will need to be revisited and revised before November 20, 1998.

#### Facility-Wide Reports

**Draft Final Basewide FOSL:** The draft final FOSL was submitted on January 7, 1998. The Navy's response to Regulatory Agencies and San Francisco Redevelopment Agency comments on the Draft Final Basewide FOSL was submitted on March 23, 1998. The Final Basewide FOSL will be signed and submitted by the end of April 1999.

#### Removal Actions

Removal Action	Status	Draft Construction Summary Report Submitted	Draft Final Construction Summary Report (CSR) Submitted
Exploratory Excavations	Fieldwork completed. Final letter from Navy to be submitted in November.	September 29, 1997	Estimate Final letter November 1998
IR-9 Pickling and Plate Yard Removal	Fieldwork completed. EPA submitted comments on May 14, 1998 and June 22, 1998 suggested additional discussion of the issues. The Navy will respond to EPA comments and then finalize the CSR.	August 2, 1996	Estimated 45 days after Navy responds to comments.
IR-1/21 Groundwater Removal Action	Received a draft sanitary sewer discharge permit for Navy review. Expect to finish start up activities for the groundwater extraction system in December..	February 25, 1999	Estimated 45 days after receipt of Agency comments
IR-3 Waste Oil Reclamation Ponds Removal Action	Fieldwork was completed.	January 26, 1999	Estimated 45 days after receipt of Agency comments
IR-50 Storm Drain Sediment Removal Action	Fieldwork completed. The Navy issued a letter October 5, 1998 confirming project completion and the response to agencies' comments	December 19, 1997	Final letter October 5, 1998
IR-57 Dry Dock 4 Drainage Culverts Removal Action	Fieldwork completed. Comments were received from EPA on June 2, 1998.	January 8, 1998	Estimate November 16, 1998
IR-6 Tank Farm Removal Action	Fieldwork completed..	February 23, 1998	Estimate December 1998

for   
 Richard Powell  
 Lead Remedial Project Manager

11/18/98  
 Date